

# **EXHIBIT 20**

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U.S. Department  
of Transportation

Federal Aviation  
Administration

Civil Aviation Security



Security Directive  
Information of Concern to Aviation Security Personnel:  
Current Security Procedures Should be Reviewed

Subject: Threat to Air Carriers

Number: **\*\*SD-96-03H\*\***

Date: **\*\*December 15, 1997\*\***

**EXPIRATION: \*\*June 30, 1998\*\***

**\*\*THIS SD SUPERSEDES SD-96-03H\*\***

NOTE: Changes are indicated by text that is bolded and highlighted by double asterisks (\*\*).

Revision Summary:

The following changes reflected in this SD:

- Extends the expiration date from December 31, 1997, to June 30, 1998;
- Updates the Information section.

**INFORMATION:**

Available information points not only to a continuing high level of threat to United States (U.S.) interests in many areas abroad, but to an increasing threat from international terrorist groups in the United States as well.

In recent years, the United States has become a more attractive target for terrorist attacks. Between 1983 and 1990, there were no international terrorist attacks in the United States. Since then, however, several politically motivated, violent terrorist incidents have occurred. The most spectacular was the February 26, 1993, bombing of the World Trade Center in New York City. This attack dramatically demonstrated the capability and intent of international terrorists to operate in the United States. Since that time, the threat posed by foreign terrorists in the United States has increased, and the Federal Aviation Administration (FAA) believes that the threat will continue for the foreseeable future.

Of specific concern are individuals, groups, and states that are hostile to the United States and that continue to threaten violence against America and American citizens in retaliation for U.S.

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policies. For example, the "Islamic Group" (IG) in early 1997 declared the United States to be Islam's number one enemy, saying that Americans and American interests everywhere were legitimate targets for attack because of the earlier U.S. imprisonment of the group's spiritual leader, Sheikh Omar Abdel Rahman. In early October 1997, the IG again reiterated its earlier warnings that the United States would be held accountable should anything "untoward" happen to Sheikh Rahman. The government of Iran, for its part, responded to U.S. military exercises in the Persian Gulf by repeating earlier warnings of unspecified worldwide retaliation for any foreign attack on the Islamic regime.

In addition, a variety of other transnational radical Islamic terrorist groups have a presence in the United States. Among these are loosely affiliated extremists who operate outside the tightly structured, centralized manner of traditional groups. Instead, these individuals rely on their personal connections to other individuals with similar political agenda in order to perpetrate acts of terrorism. The amorphous, ad hoc nature of these elements poses a new challenge to law enforcement in identifying, predicting, or interdicting their activities. The individuals responsible for the bombing of the World Trade Center and those convicted of the plan to attack several U.S. air carriers in East Asia in early 1995 are examples of the threat posed by loosely affiliated terrorists.

Civil aviation has been a prominent target of these and other transnational terrorists. In the past several years, information has been received that individuals in the United States associated with loosely affiliated extremists have discussed targeting commercial aircraft and civil aviation facilities. Loosely affiliated extremists have also shown a particular interest in media reporting regarding airline and airport security.

Civil aviation is not the only possible target for terrorists operating in the United States, and it may not even be the most likely one, but it remains a current target in the terrorists' inventories. The possibility continues to exist for anti-U.S. violence in the United States by international terrorist groups or loosely affiliated individuals who are motivated by their hatred of the United States and Israel. As such, a terrorist attack in the United States could occur with little or no warning.

**FAA COMMENT:** We are directing the continuation of the following security measures in light of the above information. Air carriers will continue to be at AVSEC alert level III.

**ACTIONS REQUIRED BY U.S. CARRIERS:**

[NOTE 1: For purposes of this security directive, the term "shipper" means the originator of the cargo and is consistent with the definition in Air Carrier Standard Security Program (ACSSP) section IX.A.]

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Air carriers shall apply the following measures for all domestic and international flights departing from locations within the United States (all 50 States and Puerto Rico).

Effective immediately:

- A.. The air carrier shall not accept either cargo or small packages directly from known shippers unless it has obtained the shipper's security endorsement and personal identification information from the shipper or a representative authorized by the shipper.

## Shipper's Security Endorsement

I certify that this shipment does not contain any unauthorized explosives, destructive devices or hazardous materials. I consent to a search of this shipment. I am aware that this endorsement and original signature, along with other shipping documents, will be retained on file until the shipment is delivered.

Shipper's Name \_\_\_\_\_ Date \_\_\_\_\_  
Signature of Shipper or Authorized Representative \_\_\_\_\_

## Personal Identification Information

Type of first personal identification reviewed: \_\_\_\_\_  
Matching photo on ID? Indicate: Yes or No \_\_\_\_\_  
Number appearing on ID \_\_\_\_\_

Type of second personal identification reviewed (if the first was not a government or employer issued photo ID): \_\_\_\_\_  
Matching photo on ID? Indicate: Yes or No \_\_\_\_\_  
Number appearing on ID \_\_\_\_\_

Name of person from whom shipment was accepted if different from the shipper  
\_\_\_\_\_

[NOTE 2: The air carrier must review and record EITHER one official photo identification medium issued by a government authority or employer, OR review and record two other forms of identification at least one of which must be issued by a government authority.]

- B. The information contained in A. above must be retained at the local station for a minimum of seven days, and attached to the applicable air waybill.

[NOTE 3: Paragraph A. supersedes ACSSP Sections IX.D.3., and IX.F.1., and 2.]

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- C. In addition to the measures listed in paragraph A. and B., above, for each cargo shipment and small package accepted directly from other than a known shipper, the air carrier shall subject the contents of the cargo to one of the following: physical search, x-ray, trace detection using equipment assessed by the FAA as effective, or examination by an FAA certified K-9 team.

[NOTE 4: The purpose of Paragraph C. is to verify that the contents of the cargo are as described on all available shipping documents, or that the package does not contain a threat item.]

[NOTE 5: Paragraph C., supersedes ACSSP Section IX.E.1., and 2., and Section IX.F.3.]

- D. For each consolidated cargo consignment (which may also be known as "agent shipments," "back-to-back shipments," or a "regular consolidation") accepted from any indirect air carrier operating with an FAA-approved security program, either for domestic or international shipments, and which has not adopted FAA-approved alternate procedures, the air carrier shall carry out either subparagraph D.1., D.2., or D.3., below, and shall maintain a record of its compliance for seven days or the expected delivery time of the cargo, whichever is longer. (This paragraph refers to indirect air carriers which have an original Part 109 program).

For each consolidated cargo consignment (which may also be known as "agent shipments," "back to back shipments," or a "regular consolidation") obtained from any indirect air carrier operating with an FAA-approved security program, either for domestic or international shipments, and which has adopted FAA approved alternate procedures, the air carrier shall carry out either subparagraph D.1., D.2., D.3., or D.4., below, and shall maintain a record of its compliance for seven days or the expected delivery time of the cargo, whichever is longer. (This paragraph refers to indirect air carriers under Part 109 with approved alternative procedures).

For cargo items and/or packages accepted from any air carrier not required to carry out security measures approved by the FAA, and all cargo carriers who have adopted a voluntary program, the air carrier shall carry out either subparagraph D.2., D.3. or D.5., below and shall maintain a record of its compliance for seven days or the expected delivery time of the cargo, whichever is longer.

1. Obtain a written certification from each consolidated cargo consignment from the indirect air carrier

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- H. Once a day, at each station where U.S. mail is accepted, the air carrier must obtain the following written statement, and maintain the statement at the station for a minimum of seven days, from the tendering postal official.

"The Postal Service certifies that procedures are in place and operational to ensure compliance with the interagency agreement with the FAA for mail tendered at (name of airport) on (insert date) to include any mail tendered by Emery Worldwide Airways, on behalf of U.S. Postal Service.

**APPROVAL OF ALTERNATIVE MEASURES:**

With respect to the provisions of this SD, according to 14 CFR Section 108.18(c), air carriers may submit in writing to their PSI, proposed alternative measures and the basis for submitting the alternative measures.

**AIR CARRIER DISSEMINATION REQUIRED:**

Within 24 hours of receipt of this Directive, the air carrier shall provide written confirmation to the PSI that all stations affected have acknowledged receipt of the information in the Directive to ensure full implementation.

The air carriers shall disseminate this information to senior management personnel, GSC's, and supervisory security personnel at all airports within the United States and its territories only. All recipients must limit dissemination within their respective organizations to personnel with an operational need-to-know.

All air carrier personnel performing security duties implementing this SD must be briefed by the air carrier on its content and the restrictions governing dissemination. No other dissemination may be made without prior approval of the Associate Administrator for Civil Aviation Security. Unauthorized dissemination of this document or information contained herein is prohibited by 14 CFR 108.18.

**FOR FAA ACTION ONLY: DISSEMINATION**

The FAA shall issue this Directive immediately to the corporate security element of all affected US air carriers and airports.

**FOR STATE DEPARTMENT:**

Retransmittal to appropriate foreign posts is authorized. Post must refer to STATE 093752, 300308Z Mar 93, Subject: FAA Security Directives and Information Circulars: Definitions and Handling, for specific guidance and dissemination.

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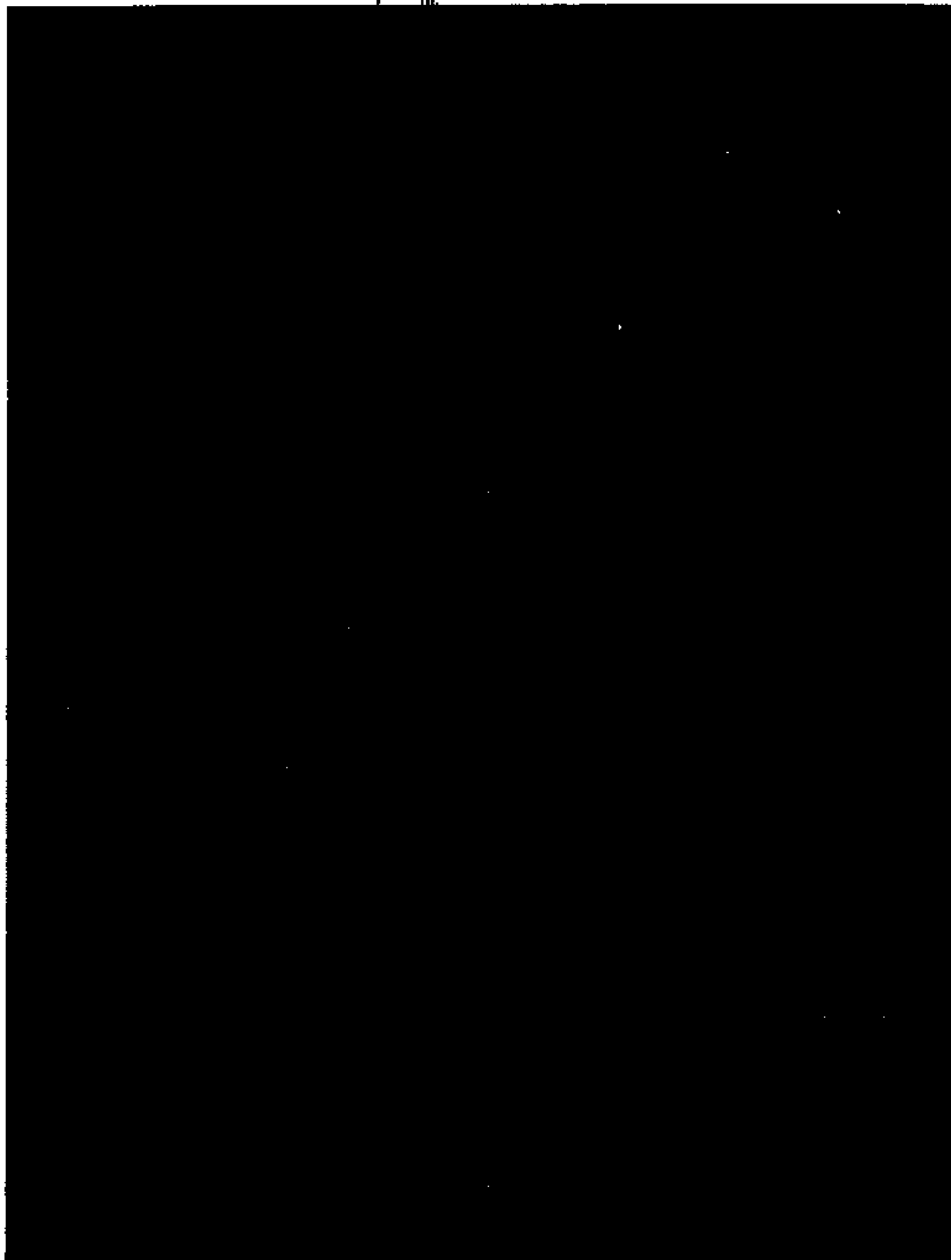
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[NOTE 6: The purpose of Paragraph 1.3. is to verify that the contents of the cargo are as described on all available shipping documents, and that the cargo does not contain a threat item.]



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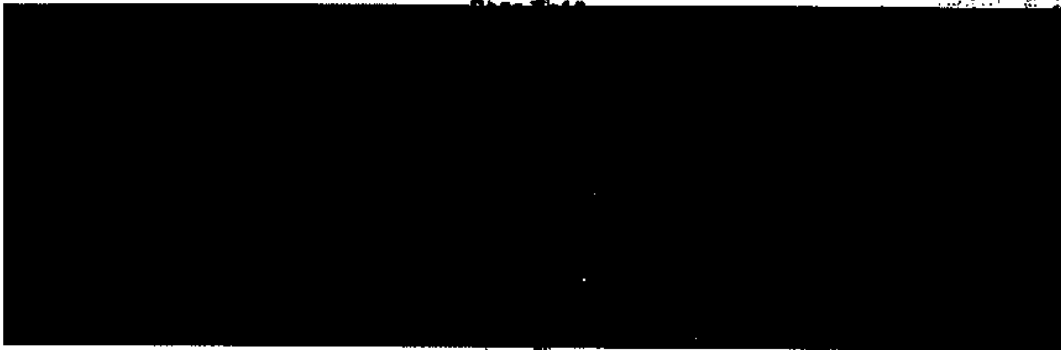
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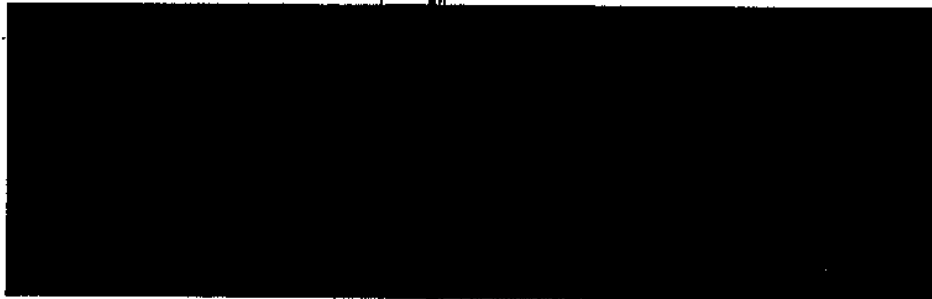
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- E. The air carrier shall obtain the following information in writing from the tendering indirect air carrier with an FAA approved security program, not processed under D.4., above, and retain it at the local station for a minimum of seven days or the expected delivery time of the cargo, whichever is longer:



[Note 8: The information required by paragraph E., above, may be combined with the written certification described in paragraph D.1., above, and provided to the air carrier as one document.]

- F. The air carrier shall subject any cargo that any indirect air carrier with an FAA-approved security program identifies as having originated from other than a known shipper to a physical search, individualized x-ray examination, trace detection equipment assessed by the FAA as effective, or examination by an FAA certified K-9 team.
- G. For each consolidated cargo consignment (which may also be known as "agent shipments," "back-to-back shipments," or a "regular consolidation") accepted from any indirect air carrier operating without an FAA-approved security program (either for domestic or international shipments), the air carrier shall apply the following procedures: a physical search, individualized x-ray examination, trace detection equipment assessed by the FAA as effective, or examination by an FAA certified K-9 team. The air carrier will inform the indirect air carrier that all packages are subject to search.

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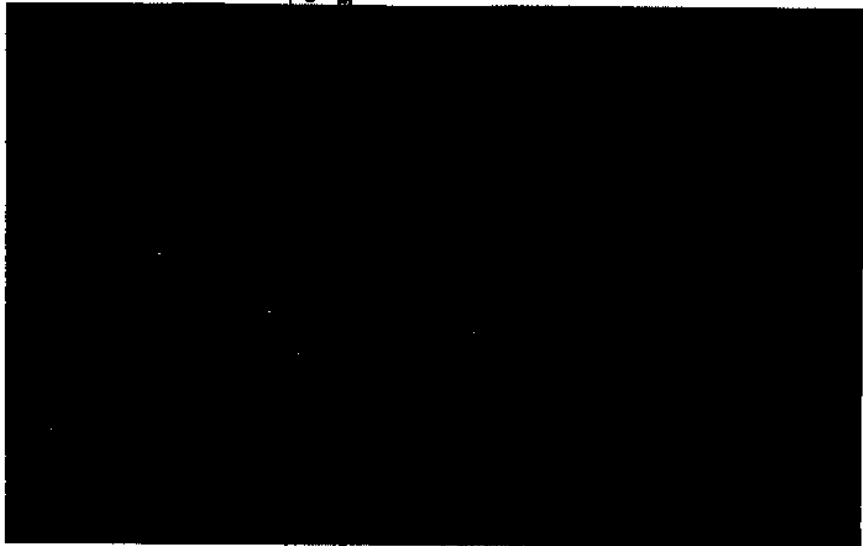
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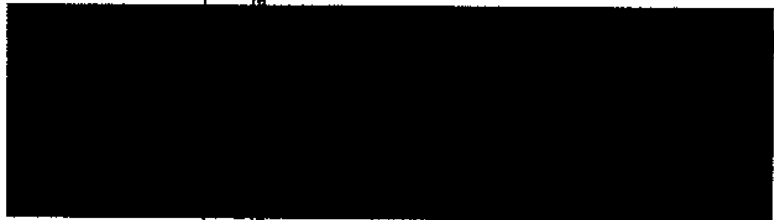
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2. The air carrier shall read and examine all available documentation (including but not limited to packing slips, manifest and house air waybills, shipper's export declarations) to determine the name and address of all the shippers represented in the consolidation.

a.



- b. [redacted] the air carrier shall make the following notification to the shipper:

"The U.S. Government has required (name of airline) to inspect your cargo to verify its contents prior to air transportation. Your cargo will be subject to search."

3. The air carrier shall subject any cargo not cleared under subparagraph D.1. or D.2. above to a physical search, individualized x-ray examination, trace detection equipment assessed by the FAA as effective, or examination by an FAA certified K-9 team.

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